



David Krutzfeldt
 Mayor
 City of Oskaloosa, Iowa
 Phone: 641.673.9431

Narrative Information Sheet

Applicant Identification:	City of Oskaloosa 220 South Market Street Oskaloosa, Iowa 52577
Funding Requested:	a) Assessment Grant Type: Community-wide b) Federal Funds Requested i) \$300,000 ii) No site specific waiver requested c) Contamination: Hazardous Substances
Location:	Oskaloosa, Mahaska County, Iowa
Property Information for Site-Specific Proposals	The City of Oskaloosa is applying for a Community-Wide assessment grant and therefore this section is not applicable.
Contacts: a) Project Director: Akhilesh Pal, Public Works Director City of Oskaloosa 804 South D Street Oskaloosa, Iowa 52577 Phone: (641) 673-7472 E-mail: akhilesh.pal@oskaloosaiowa.org	b) Chief Executive/Highest Ranking Elected Official: David Krutzfeldt, Mayor City of Oskaloosa 220 South Market Street Oskaloosa, Iowa 52577 Phone: (641) 673-9431 E-mail: david.krutzfeldt@oskaloosaiowa.org
Population:	11,546 (2017 estimate)
Other Factors Checklist	The following items apply to the community's proposed project: <ul style="list-style-type: none"> • The priority brownfield sites are impacted by mine-scarred land. (Page 2) • 30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield sites within the target area. (Pages 8 and 9)
Letter from the State Environmental Authority	This document is attached to the Narrative Information Sheet.

LETTER FROM STATE ENVIRONMENTAL AUTHORITY



January 7, 2019

Mr. Akilesh Pal, PE
City Engineer
City of Oskaloosa
804 South D Street
Oskaloosa, IA 52577

RE: City of Oskaloosa, Iowa – Brownfield Grant Application for
Community-wide Hazardous Substances Assessment

Dear Akilesh:

This letter is submitted as a statement of acknowledgement, review and support for the City of Oskaloosa's brownfield hazardous substances assessment grant application in the amount of \$300,000, through funding authorized by §104(k) of CERCLA. This application and brownfield assessment initiative addresses potential contamination at multiple abandoned and underutilized commercial and industrial parcels, with a specific focus on mine-scarred lands and former underground mine locations, all within the City of Oskaloosa.

Oskaloosa has a community heritage that relied heavily on strip and shallow shaft coal mining more than 75 years ago. Many former mine shafts, tailing sites, and other remnants of coal mining activities remain. Concerns about contaminants and hazardous materials remaining at these former mining sites, as well as land subsidence and groundwater contamination from leaching mine tailings, has hindered reuse and redevelopment activities at these sites.

The City seeks to encourage safe, infill development on sites where former mining activities were present, but redevelopment initiatives will not occur unless the City finds the resources and support needed to provide environmental clearance for properties in these districts; this grant application seeks to obtain those resources.

The department appreciates the opportunity to have reviewed this project and its goals, and we support the brownfield assessment and redevelopment strategies presented in this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Pins", is written over a horizontal line.

Mr. Mel Pins
Executive Officer
Iowa Brownfield Redevelopment Program

NARRATIVE

Narrative/Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a) Target Area and Brownfields

i) **Background and Description of Target Area-** Oskaloosa is a rural community of 11,546 located in southeastern Iowa at the intersection of US-63 and IA-92. The town incorporated in 1853 and serves as the seat of Mahaska County. Its early growth is attributed to an advantageous position along the national transportation network and an abundant supply of bituminous coal.

Area mining activities commenced in the 1850s to primarily satisfy local demand. The industry grew quickly as Oskaloosa's connection to the transcontinental railroad permitted the shipment of coal year-round. The community of just 8.03 square miles boasted 38 strip and shallow shaft mines with a combined annual output of more than a million tons by 1883. Oskaloosa assisted Mahaska County in surpassing all Iowa counties in production by 1895. In fact, the region became the domestic center of bituminous coal mining in the late nineteenth and early twentieth century.

Rapid mine expansions boosted Oskaloosa's population more than 40% each decade between 1870 and 1900¹. The commodity began dwindling shortly thereafter stabilizing the figure to near its current level. Mines helped solidify Oskaloosa's preeminent status in the state; unfortunately, they also created complex economic, social, and environmental issues that persist today.

Improper closures occurred regularly after the supply of coal depleted. Federal laws did not require operators to "reclaim" surface mines until 1977 which often resulted in haphazard abandonments. Iowa Department of Natural Resources (IDNR) has identified eight mine sites covering 196 acres within municipal limits but officials admit the full extent of mining in Oskaloosa is not well-documented². The larger unknown is the full impact to local human health and ecological systems. Although proposed assessments will focus on sites in one distinct area, this application considers all of Oskaloosa the target area due to its extremely limited geographical extent and population.

IDNR databases indicate a sizable collection of mine-scarred land is found near the eastern city limits surrounding the IA-23 and IA-92 intersection. Oskaloosa Paving Brick Company (~ 29 ac.) featured numerous kilns, brick presses, and a large excavation pit served by a railroad siding. Economy Mine (14.0 ac.), Isaac Davis and Son Mine (36.9 ac.), and an unnamed mine (23.9 ac.) are within close proximity. A private developer brought a massive quantity of fill dirt to indiscriminately level most of the area, including a surface water feature, for a new commercial hub in the 1970s. Officials acknowledge the work lacked proper inspection or permitting-including the installation of inadequate private storm sewer infrastructure still in use.

Big box retailers, restaurants, a grocery store, bank, and hotel built on the former operations over the next decade to become the first concentration of retail/service businesses outside of downtown; however, legacies of the inappropriate closure began almost immediately culminating into a prolonged period of decline. Mines are suspected of causing building collapses, including a K-Mart, and parking lot failures due to geotechnical instabilities. An inability to naturally move stormwater, combined with failing infrastructure, creates frequent flooding issues. Perceived environmental impacts and cleanup liability anxieties encourage businesses to relocate or simply avoid the area.

ii) **Description of the Priority Brownfield Site(s)-** Oskaloosa will rely on an established process for identifying and prioritizing brownfield sites. City staff, in collaboration with an Advisory Committee and environmental contractor, developed a GIS analysis model under an EPA Assessment Grant awarded in 2014 to provide a clear methodology for guiding investigations (see page 6 for committee details). The tool reviewed all parcels within the community (approximately

¹ <https://www.iowadatacenter.org/city-quick> (Accessed 12/18/2018)

² <https://www.iihr.uiowa.edu/igs/publications/uploads/IG-17.pdf> (Accessed 12/18/2018)

5,500) using criteria to generate a ranked list of 121 parcels displaying similar characteristics (e.g. former mine, proximity to known mines, abandoned, etc.) requiring assessment. Environmental Site Assessments (ESAs) completed under the previous grant cleared 121.03 acres for reuse including eliminating a long-standing stigma tied to a former mine spanning 18 acres at the city's most highly visible intersection. Despite the aggressive effort, an overwhelming amount of brownfields vital to protecting human health and facilitating redevelopment remain unaddressed.

Future endeavors will principally focus on evaluating the documented backlog of about 100 sites although the exact order or actual parcels may change based on public input received during this project. The City has identified four abutting priority brownfields based on the likelihood for contaminant impact and a desire to alleviate storm water frustrations for nearby property owners.

Address/Parcel ID	Acres	Past Uses	Env. Issues	Current Use/Conditions
PIN# 1118454027	7.67	Former brick plant	PAHs & metals	Vac. lot (foundations only)
PIN# 1118454018	4.43	Former mine fill area	PAHs & metals	Woods north of brick plant
1710 3 rd Ave. E.	1.07	Former mine fill area	PAHs & metals	Commercial Bank
PIN# 1118476016	4.64	Former mine fill area	PAHs & metals	K-Mart foundation/parking

A Phase II ESA of a strip mall adjacent to the former brick plant identified elevated levels of arsenic in soils. Potential exposure risks for site residents and workers required notifying IDNR. Another ESA along the plant's rail spur identified 22 abandoned drums with waste oil that required over packing and removal to prevent further spilling. What's more, frequent flooding forces the Public Works Department to shut down portions of the adjoining roadway serving the priority sites creating concerns for emergency responders and making it difficult for an aging population that already has mobility constraints (see the Threats to Sensitive Populations section). The City has tracked 12 closures of 3rd Avenue East since 2007. Clearing these brownfields of impact allows the City to simultaneously take a holistic approach to addressing the long-term infrastructure and redevelopment needs in the area. Although an unnamed creek meanders through the former brick plant, it is not within a federally designated flood plain.

b) Revitalization of the Target Area

i) Redevelopment Strategy and Alignment with Revitalization Plans- Priority brownfields will redevelop with residential uses as appropriate based on ESA results. A recent Housing Needs Assessment determined the 65+ age cohort is the fastest growing segment in Oskaloosa and demand exists for another 222 units of senior housing by 2025³. The cluster of mine-scarred lands in eastern Oskaloosa offers large swaths of contiguous properties surrounded by homes making assisted living a perfect fit. The City will leverage its reuse planning budget to determine the appropriate type and size of facility through a detailed market study. Repurposing liabilities into housing opportunities for an older population will strengthen and stabilize the declining neighborhood. It also offers a safe alternative for those impacted by negative externalities associated with brownfields- including contamination exposure.

The redevelopment strategy cited above is consistent with *The Oskaloosa Plan: A Comprehensive Plan for the City of Oskaloosa, Iowa*. The long-range planning document has a stated objective to "...help Oskaloosa identify the policies and make the investments necessary to encourage growth while maintaining its unique community character." A primary land use goal focuses on promoting efficient growth patterns as it relates to infrastructure. New development should represent a "compact urban form" to take advantage of existing public facilities. Clearing targeted properties served by water, utilities, etc. for reuse helps achieve this outcome. Further, the Future Land Use Map highlights the cluster of former mines for high-density residential uses. Extensive community involvement associated with assembling the comprehensive plan identified the referenced use as appropriate for the priority sites.

³ *Comprehensive Housing Needs Analysis, Oskaloosa, Iowa, May 2017.*

ii) Outcomes and Benefits of Redevelopment Strategy- Repurposing brownfields will provide an economic boost for Oskaloosa. The following table offers detail into potential investment⁴ and property tax revenues generated if a portion of the priority sites is redeveloped as recommended.

Land Use	Acres	Lot (sq. ft.)	Bldg. (sq. ft.)	Employ.	Wage Impact ⁵	Bldg. Invest.	Prop. Tax Rev. ⁶
Ass. Living	5	217,800	54,450	41	\$1,264,692	\$10,236,600	\$383,342

The bullet points below highlight projection assumptions.

- The 1-story assisted living facility would occupy 25% of the lot
- Employment figure is based on one employee per 1,320 square feet of space
- Wage impact is based on 41 jobs at an av. hourly wage of \$14.74 for nursing assistants⁷
- Building investment is based on a per square foot value of \$188

Approximately \$10.2 million in building investment equates to \$383,342 in annual property tax revenue and 41 new jobs resulting in \$1.3 million in annual wages. Realization of this project would be significant for the community. The City has already demonstrated a unique ability to attract public/private funds to former brownfields. **The City leveraged \$24.50 for each \$1 associated with its past EPA Brownfields award** (see Past Performance and Accomplishments).

Topography constraints prevent heavily-wooded lands north of the defunct brick plant (PIN# 1118454018) from being redeveloped. Grant funds will help protect the undeveloped land by identifying and mitigating any associated potential exposure risks. The City will then consult the Iowa Department of Agriculture and Land Stewardship Mines and Minerals Bureau for ways to preserve the area in a manner that enhances the local environment for non-profit purposes. This will likely involve enhancing the important animal habitat for the community. In fact, the Bureau won a national Abandoned Mine Land Reclamation award this summer for transitioning a 100-acre site outside of city limits in Mahaska County into a monarch butterfly and pollinator habitat.

c) Strategy for Leveraging Resources

i) Resources Needed for Site Reuse- City staff will engage the Mines and Minerals Bureau as mines are identified during the proposed project. The agency receives funds annually to reclaim sites and has an extensive history of working with private property owners in the community. Assistance is available for preparing site inventories, environmental assessments, and reclamation designs. Additional grants are then sought by the agency to construct the design. This relationship is essential to making certain all future closures are instituted in an appropriate manner.

Local officials will continue to explore other sources of funding to supplement its assessment, remediation, and/or revitalization strategy efforts for priority sites, including utilizing IDNR's 128-A funds. Mr. Mel Pins, IDNR Brownfield Coordinator, was heavily involved during the City's previous grant. This collaboration has helped advance an exciting cleanup project on an abandoned bulk oil plant/gas station surrounded by a residential neighborhood. The City will investigate the availability of these supplemental funds to satisfy site-specific needs to ensure its brownfields are returned to a sustainable re-use.

ii) Use of Existing Infrastructure- The City will exclusively use grant funds on brownfields served by existing infrastructure. All priority sites are already urbanized – meaning traditional services and utilities serve the properties. As referenced earlier, much of the private infrastructure surrounding the former mines is severely deficient. The City will expend a portion of its re-use

⁴ 2017 RSMeans Estimating Manual (includes employees and building investment per square foot) Note: costs +3.5% to account for inflation.

⁵ Assumes an average hourly rate of \$14.74 for Region 15 based on 2018 Iowa Wage Report (Iowa Workforce Development).

⁶ Based on a gross property tax levy of 37.44815 per \$1,000 of assessed value (Iowa Department of Management).

⁷ <https://www.iowaworkforcedevelopment.gov/iowa-wage-report> (Accessed 01/16/2019).

planning budget to conduct a detailed analysis of the age, condition, and capacity of the infrastructure to identify and prioritize needs to support redevelopment. If the resulting study determines upgrades are necessary, the City will likely fund the improvements using a loan from the state's revolving fund while also trying to utilize CDBG funds as a non-entitlement community.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a) Community Need

i) The Community's Need for Funding- Oskaloosa does not have the financial capability to address brownfields. A limited population size and subsequent tax base hinders the City's ability to assess, clean up, and reuse its abundance of mine-scarred lands. The City's approved FY2019 General Fund operating budget lists only \$5,514,405 in total authorized expenditures. Public safety accounts for more than 55% of all spending. Further, the City is being forced to respond to two mandates that will dramatically impact future budgets. An IDNR notice of violation for excessive infiltration and inflow requires sewer replacement, lining, and manhole rehabilitation at an estimated cost of \$7 million over the next two years. Oskaloosa also must make significant upgrades to comply with its National Pollutant Discharge Elimination permit including combining two treatment plants with biological nutrient removal for an estimated cost of \$32.7 million within 10 years. Loans will fund the work necessitating a steep increase in sewer rates.

The City is fully committed to addressing brownfields concerns. It plans to use IDNR 128-A funds to complete ESA work in the Spring of 2019; however, the current need is on a much larger scale than this source can provide. In the absence of this EPA grant, the community cannot continue to assess already-identified properties due to competing needs for extremely limited local resources.

ii) Threats to Sensitive Populations⁸

1) Health or Welfare of Sensitive Populations- Oskaloosa is experiencing a significant "graying" of its population. Elderly individuals comprise a relatively large percentage of its residents as nearly one in five (18.0%) are 65 or older. This rate exceeds comparative percentages for the State (16.1%) and United States (14.9%). Studies predict the trend will accelerate over the next decade as the baby boom generation continues aging. The Housing Assessment Needs report noted the 65 to 74 age cohort is projected to have the greatest percentage of growth (16.3%) from 2017 to 2025⁹. Many in this group also report having some form of disability status.

The percentage of people 65 years of age or older within the community experiencing self-care difficulty (8.8%) surpasses both Iowa (6.0%) and U.S. (8.2%) figures. 15.1% have independent living difficulty compared to Iowa (11.0%) and U.S. (14.8%) rates. This situation is particularly alarming as the sensitive population is frequently more vulnerable to adverse conditions and often relies on others to provide for their care and safety. Some elderly citizens may be incapable of avoiding contamination exposure in Oskaloosa as a result of past mine closure practices.

Homes are located immediately adjacent to priority sites. Identified brownfields thus have the potential to expose sensitive populations (e.g. neighborhoods with high concentrations of disabled elderly citizens) to carcinogens and other harmful impacts at a disproportional rate due to the town's demographic composition. A small creek traverses two targeted sites serving as a possible exposure conduit.

Public health benefits associated with the project are clear: assessing and characterizing priority brownfields will create healthier neighborhoods by reducing these risks through the gathering of critical information and formulating appropriate responses. Examples include the use of institutional or engineering controls. Investigation data helps officials make better-informed decisions relating to the potential need for physical cleanup to safeguard human health or if an

⁸ Statistics cited in the Threats to Sensitive Populations section are from the 2013-2017 American Community Survey 5-Year Estimate.

⁹ *Comprehensive Housing Needs Analysis, Oskaloosa, Iowa*, May 2017.

environmental covenant addressing activity and use limitations would suffice. This work will ultimately culminate in improved local air, land, and water quality which in turn also makes progress towards achieving environmental justice for sensitive populations.

2) Greater Than Normal Incidences of Disease and Adverse Health Conditions- Abandoned mines can become immediate dangers to public health via leaking abandoned product containers and cyanide releases. Runoff can also adversely impact water quality for human use as it often carries heavy metals and is extremely acidic. Further, acid mine drainage can cause additional leaching of metals and compounds that would otherwise remain in native and non-native soil and that under normal conditions would pose minimal-to-no risk. The mine cluster is suspect for the potential release of contaminants including Resource Conservation and Recovery Act (RCRA) metals, heavy metals, and polycyclic aromatic hydrocarbons (PAHs). The table below summarizes potential health effects associated with contaminants likely to exist near targeted sites.

Contaminant	Potential Health Effects
PAHs	Possible birth defects and liver/blood problems. Known carcinogen.
Metals	Cardiovascular, organ growth, digestive, hematological, musculoskeletal, urinary systems or kidneys, neurological, ocular, reproductive problems. Prob. carcinogen.

Health studies suggest the City's brownfields may already be impacting residents (see bulleted items below). This situation is especially troubling based on the high percentages of sensitive populations residing in the community. As referenced above, an elevated level of people 65 years of age or older identify as having independent living or self-care difficulties. Interaction with contaminants via direct contact, inhalation of airborne particulates, and vapor intrusion pathways exposes individuals to known carcinogens or alternative health impairments.

- National Cancer Institute lists Mahaska County's cancer mortality rate (all races and ages and both sexes) at 183.1 per 100,000 people from 2011-2015¹⁰. This figure falls well short of the Healthy People Objective rate (161.4). Further, it exceeds Iowa and U.S. rates of 167.8 and 163.5 per 100,000, respectively. Age-adjusted death rates for those 65+ is worse (984.4/100,000) compared to Iowa (967.9) and U.S. (934.1). Targeted brownfields likely used carcinogens which could contribute to these high mortality rates.
- *County Health Rankings*, a Robert Wood Johnson Foundation and University of Wisconsin Population Health Institute collaboration, analyzes health outcomes (length of life and quality of life) and health factors (health behaviors, clinical care, social and economic factors, and the physical environment)¹¹. Mahaska County ranked in the bottom half of Iowa counties (51st of 99) in the physical environment category that analyzes air pollution, drinking water violations, severe housing problems, driving alone to work, and long commute-driving alone. Of particular concern is the county's 9.8 micrograms per cubic meter in daily fine particulate matter when compared to the state's rate (9.6).

Proposed funding allows the City to further assess the sources of contaminants, quantify the presence of hazardous substances, and develop a suitable remedy to reducing exposure concerns. The City will facilitate enrolling properties determined to require corrective action into Iowa's Land Recycling Program. The voluntary program utilizes Risk Based Corrective Action levels based on EPA's cumulative increased cancer risk evaluations and requires public notification for all corrective actions. Further, identifying and removing exposure risks through smart redevelopment- which may include remediation activities consistent with the Standard Guide for Green Cleanups (ASTM E-2893-13e1)- will improve threats to residents impacted by brownfields.

3) Economically Impoverished/Disproportionality Impacted Populations- Economic indicators clearly demonstrate the community's depressed living conditions. Oskaloosa struggles with high rates of poverty as well as low individual and household earnings. The per capita income (\$24,505)

¹⁰ <http://statecancerprofiles.cancer.gov> (Accessed 12/18/18)

¹¹ <http://www.countyhealthrankings.org/> (Accessed 12/18/18)

is 18.5% less than the State of Iowa (\$30,063) and 21.4% less than the United States. (\$31,177). Median household income data depicts an even more dire picture. Oskaloosa's figure (\$41,392) is 26.9% less than the State (\$56,570) and 28.3% less than the U.S. (\$57,652). Limited financial resources are a primary reason that individuals and families are unable to relocate from living near brownfields. This causes low-income households to bear a disproportionate share of negative externalities (e.g. health effects, property value loss, safety concerns, etc.) associated with the sites.

Elevated levels of poverty plague the community as a consequence of reduced earnings. In fact, over one of every five people in Oskaloosa (20.1%) are unable to fulfill basic food requirements. This percentage far outstrips the rate for Iowa (12.0%) and the U.S. (14.6%). The number of local students participating in the National School Lunch Program further demonstrates the City's economically-disadvantaged position. 2017-2018 statistics provided by the Oskaloosa School District indicate more than two of every five students (44.1%) attending their schools was eligible for the program. The percentage at the community's lone elementary school is 51.2%.

Inappropriate mine closures continue to create hardships for residents and business owners surrounding the priority sites. Private storm water infrastructure that is undersized, failing, and installed without city inspections, combined with an inability to naturally move storm water, causes frequent flooding issues during routine rain events. Investigations completed under the grant will provide critical information to the City as it works to design and construct new storm water utilities. Data related to subsurface impact will guide the selection of appropriate materials, inform worker health and safety procedures during construction, and ensure that contaminated media is handled properly and, if needed, disposed of correctly.

b) Community Engagement

i) Community Involvement- Community-based organizations were critical to the success of the City's initial EPA Brownfields Assessment Grants. All previous project partners will remain highly-engaged in future efforts. The following table summarizes their respective roles:

Partner Name	Point of Contact	Specific Role in the Project
Oskaloosa Comm. School District	Name: Paula Wright E: wrightp@oskycsd.org P: 641-673-8345	<ul style="list-style-type: none"> • use of facilities for outreach meetings • distributing outreach materials • reuse planning classroom project for students
Mahaska Co. Dev. Group/Osk. Area Cham. Dev. Group	Name: Tom Flaherty E: tflaherty@oacdg.org P: 641-672-2591	<ul style="list-style-type: none"> • securing signed access agreements • meeting with owners of targeted properties • distributing outreach materials
George Daily Family Trust	Name: Linda Crookham-Hansen E: linda.crookham-hansen@musco.com P: 641-672-2692	<ul style="list-style-type: none"> • reviewing brownfields reuse projects for funding opportunities based on its mission • distributing outreach materials • meeting with owners of targeted properties
William Penn University	Name: Debbie E. Stevens E: stevensde@wmpenn.edu P: 641-673-2173	<ul style="list-style-type: none"> • use of facilities for outreach meetings • producing/distributing outreach materials • engaging students/faculty
Oskaloosa Planning and Zoning Commission	Name: Wyndell Campbell E: wyndell@insureosky.com P: 641-673-4462	<ul style="list-style-type: none"> • review brownfields re-use plans • meeting with owners of targeted properties • distributing outreach materials
Kiwanis Club	Name: Ryan Ischer E: Ryan.Ischer@rainhail.com P: 515-520-0829	<ul style="list-style-type: none"> • review brownfields re-use plans • distributing outreach materials • meeting with owners of targeted properties

A representative from each entity will again serve on the Advisory Committee to help guide project decisions including selecting sites for assessment, cleanup, and future redevelopment. This will involve reviewing the GIS model criteria used to identify brownfields, making any desired changes, and considering/incorporating feedback from the community input process (described

below) to ultimately prioritize sites. The City will also engage the group during the proposed market study planning activity. Their invaluable knowledge will help the contractor gain a better understanding of the area's demographics, economy, market conditions, regulations, etc.

ii) Incorporating Community Input- The City has made a concerted effort to empower and inform people during its brownfields efforts. It remains committed to involving key stakeholders such as citizens, property owners, lenders, businesses, and developers throughout the project. This includes engaging everyone in the decision-making process. Communications will be a "two-way street" focused on open dialog as opposed to a "top-down" dissemination approach. City officials will utilize the following methods of communicating project progress and soliciting input based on its effectiveness during the previous cooperative agreement. Moreover, using traditional mediums (e.g. newspaper articles) better ensures Oskaloosa's elderly population has access to the information as opposed to solely relying on the internet for distribution.

Mechanism	Frequency	Summary
Outreach Meetings	Annually	Interactive presentation intended to create dialogue with citizens. Held within public facilities at varying times for better attendance.
Project Website	Continuous	Provides project transparency by making all reports and news publicly available. Comment forms posted. (www.oskaloosaiowa.org/brownfields)
Brochure	Continuous	Summarizes brownfields program. Available at all city-owned facilities.
Newspaper	Annually	Provides regular project updates to a wide audience.
Depository	Continuous	Public able to review any project document. Available at Public Works.
Adv. Comm.	Biannually	Volunteer grassroots group that helps guide project decisions.

Numerous active (e.g. meetings) and passive (e.g. comment forms on the project website) opportunities will be available for citizens to offer meaningful site selection input. City staff and Advisory Committee members will review each suggested brownfield based on the following criteria before making a determination of whether to include the property into its list of targeted sites: redevelopment potential; job and business creation potential; blight elimination; compliance with adopted planning documents; and availability of leveraged funds to facilitate re-use. Staff will provide a direct response via e-mail or phone call to each individual explaining the decision. A comprehensive document that compiles all input/responses will be posted on the project website.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a) Description of Tasks and Activities- The following paragraphs describe all necessary tasks/activities to address priority brownfield sites within the 3-year performance period.

Program Implementation (Task 1)- City staff will procure a qualified environmental contractor, oversee efforts of the contractor, assist with preparing required documentation (i.e. quarterly progress reports, Final Programmatic Performance Report, federal financial reports, and MBE/WBE forms), and attend meetings with regulatory agencies as necessary. A staff member will also attend three regional and one national brownfields conference as part of Task 1. The City's contractor will oversee the development of a Quality Assurance Project Plan (QAPP), produce the referenced required documents, and lead coordination efforts with EPA, IDNR, local officials, property owners, partnering organizations, and citizens.

Community Involvement (Task 2)- City staff will facilitate approximately six Advisory Committee meetings, host three public meetings, and make presentations to local groups (e.g. Chamber). Contractor activities include preparation and attendance at open houses, preparation and attendance (via phone conference) at Advisory Committee meetings, maintaining the website, and updating brownfields brochures.

Phase I and II ESAs (Task 3)- City staff will assist with securing access agreements, submit eligibility requests, review report results, and communicate investigation findings with

EPA/IDNR. The contractor will prepare access agreements, eligibility determinations documents, Phase I and II ESA reports consistent with current ASTM standards and EPA's All Appropriate Inquiry, EPA ACRES Work Packages, and Phase II Sampling Plans. In addition, the contractor will interface with state/federal officials regarding technical matters associated with ESA findings.

Reuse Planning (Task 4)- City staff will assist with the creation of reuse planning documents including the infrastructure evaluation and the market study for priority brownfields sites. The contractor will prepare the referenced documents.

The City will use a proven schedule for activities listed above to ensure their successful completion within the three-year period. The City dedicates the first quarter of the grant to issuing a request for qualifications (RFQ) and hiring a qualified environmental contractor through a competitive selection process. The City, Advisory Committee, and contractor will collaborate in the next two quarters to prioritize brownfields sites, submit eligibility requests to the EPA, and obtain access to the properties. The City tasks its contractor to conduct Phase I ESAs during the final quarter of the first Federal Fiscal Year and first two quarters of the second year and Phase II ESAs during the third and fourth quarters. The contractor completes any necessary delineation work during the first, second, and third quarters of the final year of the grant. The City, Advisory Committee, and contractor will complete re-use planning activities including the infrastructure evaluation and the market study activities concurrently with the ESAs. The City closes the grant during the final quarter of year three. Advisory committee meetings will occur every other quarter.

An initial open house held during the first quarter of the project will inform residents of the initiative, answer questions related to the brownfields program, and gather input on the assessment of properties. A public meeting scheduled for the end of Year 2 will offer a summary of ESA findings and again seek feedback on sites potentially requiring investigation. A final open house near the grant closeout period will highlight grant successes including money leveraged, jobs created, and properties cleared.

The city anticipates conducting additional Phase I and II ESAs beyond the priority sites listed above as it continues addressing the documented backlog of approximately 100 brownfields spread across the entire 8.03-acre community. These activities will occur following the investigation of priority sites in the same schedule as outlined in the above paragraphs.

Oskaloosa recognizes the unique opportunity that these funds represent to transform a rural community of less than 12,000. As such, it will not reserve any budget for personnel/fringe benefits in an effort to maximize its award. The City is contributing its own resources to carry out any activity where staff serves as the lead entity. **All staff time will be donated in-kind at an estimated value of \$37,440.** This figure was calculated using total hours tracked under the past grant at the following hours and hourly rates by employee: Public Works Director- 256 (\$60), Engineering Technician- 384 (\$35), Secretary- 192 (\$30), and City Manager- 32 (\$90). Oskaloosa can thus commit **60% and 30% of Assessment Grant funds to conduct environmental investigations and reuse planning activities, respectively, for priority brownfields sites.**

b) Cost Estimates and Outputs- The City developed estimated costs for each task based on work completed under the City's previous cooperative agreement and EPA guidance offered as part of the eligible planning activities¹². Per unit costs are listed in the following paragraphs that define the total request outlined in the table below.

Task 1 (Program Implementation)- Contractor costs: \$12,000- develop QAPP (\$3,500); complete required programmatic documentation (\$5,500); and lead project coordination efforts (\$3,000).

¹² <https://www.epa.gov/brownfields/information-eligible-planning-activities> (Accessed 01/16/19)

Travel Costs: \$2,000- One staff member to attend three regional conferences (\$100/event) and a national conference (\$550/flight, \$450/hotel, \$300/car rental, and \$400/meals).

Task 2 (Community Involvement)- Contractor costs: \$15,000- preparation and attendance at three open houses (\$1,000/event); preparation and attendance (via phone conference) at six Advisory Committee meetings (\$250/event); maintaining the City's highly-interactive project website (\$7,500); and updating brownfields brochures (\$3,000). Supplies: \$1,000- printing costs for the brochure, open house posters, and meeting notices for distribution.

Task 3 (Phase I and II ESAs)- Contractor costs: \$180,000- conduct 16 Phase I ESAs (\$4,500/report which includes fees for preparing access agreements, site eligibility determinations documents, and EPA ACRES Work Packages); conduct 8 Phase II ESAs (\$12,500/report which includes fees for development of Phase II Sampling Plans occasional use of ground penetrating radar to identify subsurface voids like mine entryways and shafts; and interfacing with state/federal officials regarding technical matters associated with findings from ESAs (\$8,000).

Task 4 (Reuse Planning)- Contractor costs: \$90,000- Infrastructure evaluation of the target area of former mines located southwest of the IA-23 and IA-92 intersection which includes all priority brownfields sites (\$60,000) and a market study for priority brownfield sites to determine the feasibility of varying types of assisted living facilities (\$30,000).

Budget Categories	Project Tasks				Total
	[Task 1] Prog. Imp.	[Task 2] Comm. Inv.	[Task 3] Phase I/II ESAs	[Task 4] Reuse Planning	
Personnel					
Fringe Ben.					
Travel	\$2,000				\$2,000
Equipment					
Supplies		\$1,000			\$1,000
Contractual	\$12,000	\$15,000	\$180,000	\$90,000	\$297,000
Other					
Tot. Direct Costs	\$14,000	\$16,000	\$180,000	\$90,000	\$300,000
Indirect Costs					
Total Budget					\$300,000

c) **Measuring Environmental Results-** The City will develop a comprehensive schedule and detailed work plan for tracking, measuring, and evaluating progress towards achieving expected outputs, outcomes, and results under this proposed cooperative agreement. This includes associating milestone dates and metrics with specific tasks. The document will serve as a framework for conveying information in quarterly progress reports submitted to EPA Region 7. Staff will also continue the past practice of conducting monthly phone calls with its EPA Project Officer and contractor to ensure compliance with its work plan. This approach allows the City to achieve project goals in an efficient manner or devise an appropriate plan to correct deficiencies. Mr. Pal (see org. structure below) will manage the schedule to ensure the project remains on track.

4. PROGRAMMATIC CAPABILITY

a) Programmatic Capability

i) **Organizational Structure-** The City will assign monitoring and compliance authority to Mr. Akhilesh Pal, P.E., Public Works Director, and Mr. Michael Schrock Jr., City Manager. These individuals managed the previous cooperative agreement and will again ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements of the project and grant.

Mr. Pal earned a M.S. in Civil Engineering from the University of Alabama and has served in his position with the City for ten years. He is responsible for planning and supervising engineering projects, roadway maintenance, traffic engineering, transportation planning, sanitary sewer improvements, fleet management, and other public works activities. Mr. Schrock Jr. serves as the City's Chief Executive Officer and is responsible for carrying out City Council goals and policy decisions; overseeing operations; preparing and managing the budget; attending City Council meetings; informing and advising City Council; and, serving as the City's representative. He earned his MPA from the University of Arizona and has been with the City for ten years.

ii) Acquiring Additional Resources- The City will acquire additional expertise and resources required to implement the grant through the services of a qualified professional. Subject to a competitive selection process consistent with federal procurement guidelines, the City will hire an environmental contractor with full service engineering capabilities and significant experience in the EPA Brownfields program. The City's established procedure includes seeking RFQs reviewed by staff and ultimately approved by Council. In the unlikely event of significant turnover, the City will retain leadership using other staff familiar with EPA brownfields projects. Mr. Sean Murphy, Engineering Technician, was routinely tasked with securing access agreements; communicating with property owners and the environmental consultant; and interacting with regulatory agencies on the City's behalf. As evidenced, the City utilizes a team approach to ensure the project is not dependent on a small number of staff. This helps make certain it can achieve work plan milestones.

b) Past Performance and Accomplishments

i) Currently Has or Previously Received an EPA Brownfields Grant

1) Accomplishments- Oskaloosa received a \$400,000 EPA Brownfields Assessment Grant in 2014 (BF 97746201). The City conducted 20 Phase I ESAs on 30 parcels totaling 139.81 acres and 10 Phase II ESAs on 13 parcels totaling 66.05 acres. This cleared 11 properties totaling 121.03 acres for reuse. **The Assessment Grant facilitated \$9.8 million in private/public investment** via new development, title transfers, and "shovel ready" certifications including a \$8.25 million, 76-room hotel which represents the 2nd largest community project in the past 10 years. Plans for a \$19 million early childhood center on another former brownfield are underway. Other notable outcomes/outputs include an informed and engaged citizenry. A focus on transparency made all documentation available for review. A webportal linked on www.oskaloosaiowa.org/brownfields provides reports, photographs, parcel information, and site status. Staff continually receives feedback on its usefulness. Further, open houses, as well as the Advisory Committee, offered chances to provide meaningful input directly impacting the decision-making process.

Oskaloosa understands the importance of maintaining its ACRES database. The City is diligent in reporting jobs created, funds leveraged, etc. resulting from its initiative. All outputs/outcomes from the past cooperative agreement are accurately reflected in ACRES at the time of this proposal.

2) Compliance with Grant Requirements- The City satisfied all requirements of the previous grant including complying with the workplan, schedule, and terms and conditions. Unforeseen delays associated with receiving QAPP approval necessitated the City requesting a one-year extension of its cooperative agreement at the suggestion of the EPA Project Officer. The extra time allowed the City to achieve all milestone tasks outlined in the workplan.

The City has made and reported on progress towards achieving expected results of the grant in a timely manner. This included submitting quarterly progress reports, MBE/WBE forms, Final Programmatic Performance Report, federal financial reports within their respective acceptable timeframe. City staff took pride in offering detailed documents that oriented readers to progress that occurred. Further, the City made updating its EPA ACRES database a top priority. Consistent with current practices, the City is committed to reporting future accomplishments beyond the grant period to support the EPA Brownfields program. No funds remained when the grant closed.

THRESHOLD CRITERIA RESPONSE

Threshold Criteria

1. Applicant Eligibility

The City of Oskaloosa is eligible for funding as a General Purpose Unit of Local Government.

2. Community Involvement

The City of Oskaloosa understands the importance of engaging its residents throughout the entire project period. In fact, the City expended considerable effort under its prior cooperative agreement empowering people during planning, implementation, and other brownfield assessment activities. City officials will expand upon the extensive outreach campaign.

The City of Oskaloosa established an Advisory Committee to help provide guidance during its previous brownfields redevelopment program. The group consisted of the following: City Manager, Director of Public Works, Engineering Technician, and a representative from each of the project partners including Mahaska County Development Group/Oskaloosa Area Chamber and Development Group, George Daily Trust, William Penn University, Oskaloosa Planning and Zoning Commission, Kiwanis Club, and Oskaloosa Community School District. The group will have the following responsibilities: establish property priorities for environmental site assessments, address reuse planning and redevelopment issues associated with the project, help mitigate challenges experienced with securing access agreements, and help vet funding opportunities that can contribute to redevelopment efforts. The Advisory Committee will also help host public meetings to gather input regarding site selection/prioritization, disseminate environmental investigation results to community groups, and help formulate cleanup alternatives.

The City will also continue using the following methods to engage and inform the community during the three-year grant period:

- keep its project website (www.oskaloosaiowa.org/brownfields) up-to-date with all Phase I and II Environmental Site Assessment (ESA) reports, property photographs, parcel information for targeted sites, key milestone dates, open house/public meeting time announcements, project “success stories”, etc.
- update its brownfields brochure (currently available for download at <http://ia-oskaloosa.civicplus.com/DocumentCenter/View/786>) for distribution that explains the EPA Brownfields Program, provides information on the Phase I and Phase II ESA process, answers FAQs, and highlights the benefits of participating
- issue annual project updates to area media outlets including the local newspaper (*Oskaloosa Herald*), news station (KTVO), and numerous radio stations
- host one open house annually at varying locations (e.g. local school, religious place of worship, retirement home, etc.) to keep the general public informed about project progress and to seek input from interested citizens- likely done via citizen comment forms- on various topics (e.g. site selection, cleanup options, redevelopment planning, etc.)
- maintain and promote the availability of all project files (QAPP, quarterly process reports, financial status reports, Phase I and II ESA reports, Phase II Sampling Plans, etc.) for public inspection in a depository at the City’s Public Works Building

3. Expenditure of Assessment Grant Funds
The City does not have an active EPA Brownfields Assessment Grant.

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

01/30/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Oskaloosa

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

42-6005086

*** c. Organizational DUNS:**

0564164560000

d. Address:

*** Street1:**

220 South Market Street

Street2:

*** City:**

Oskaloosa

County/Parish:

*** State:**

IA: Iowa

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

52577-3133

e. Organizational Unit:

Department Name:

Public Works Department

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

*** First Name:**

Akhilesh

Middle Name:

*** Last Name:**

Pal

Suffix:

Title:

Public Works Director

Organizational Affiliation:

City of Oskaloosa

*** Telephone Number:**

641-673-7472

Fax Number:

641-673-3733

*** Email:**

akhilesh.pal@oskaloosaiowa.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Oskaloosa 2019 Brownfields Community-Wide Hazardous Substances Assessment

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: